

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X

KELTON DAVIS, WILLIAM TURNER, ALTAGRACIA
HERNANDEZ, EDWIN LARREGUI, ROMAN JACKSON,
KRISTIN JOHNSON, ELEANOR BRITT, ANTHONY
ANDERSON, LASHAUN SMITH, SHAWNE JONES,
HECTOR SUAREZ, ADAM COOPER, ANDREW
WASHINGTON, P.L. by his parent LISA PIGGOTT, DAVID
WILSON, and GENEVA WILSON, individually and on behalf
of a class of all others similarly situated,

Plaintiffs,

-against-

THE CITY OF NEW YORK and NEW YORK CITY
HOUSING AUTHORITY,

Defendants.

----- X

**SUPPLEMENTAL
DECLARATION OF
EDWARD DELATORRE**

10 Civ. 699 (SAS)

EDWARD DELATORRE, declares under penalty of perjury and pursuant to 28
U.S.C. § 1746, that the following statements are true and correct:

1. I am an Assistant Chief in the New York City Police Department ("NYPD")
and have been with the NYPD since 1980. In addition to other positions I have held since that
time, including Commanding Officer of the Police Academy, I have been the Executive Officer
of the NYPD's Housing Bureau since August 2005. As such, I am familiar with the facts stated
herein. I submit this supplemental declaration in further support of Defendant City of New
York's Memorandum of Law in Support of Its Motion for Summary Judgment on Plaintiffs'
Claim For Injunctive Relief.

2. As I stated in my initial declaration dated December 10, 2010 ("Delatorre
12/10/10 Decl."), the NYPD has developed a training curriculum for Interim Order 23.

Delatorre 12/10/10 Decl. ¶¶ 21-22. Presentation of the training curriculum to police officers is ongoing. Phase I of the training, which I described in my initial declaration, *id.* ¶ 25, is now approximately 95% complete.

3. In addition to the training of officers already on duty, or “in-service training,” which I referred to as Phase I and Phase II in my initial declaration, *id.*, all new recruits are also receiving the training curriculum at the Police Academy. In fact, the class of approximately 1150 recruits that graduated in December 2010 received this training.

4. Finally, as it applies to the Organized Crime Control Bureau (“OCCB”), which includes the Narcotics Division, all OCCB trainers have received the curriculum and the training to implement Phase II, and all members of OCCB will be trained within the timeframe previously outlined for this Phase.

WHEREFORE, I respectfully request that Defendant’s motion be granted in its entirety.

Dated: New York, New York
January 7, 2011

A handwritten signature in black ink, appearing to read 'Edward Delatorre', written over a horizontal line.

EDWARD DELATORRE